

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

BRENNAN M. GILMORE,

Plaintiff,

v.

ALEXANDER E. (ALEX) JONES, et al.,

Defendants.

No. 3:18-cv-00017-NKM-JCH

STIPULATION AND [PROPOSED] ORDER

WHEREAS, Plaintiff Brennan Gilmore (“Gilmore”) sued Defendant Derrick Wilburn (“Wilburn”) for defamation in connection with Wilburn’s authorship of “BOMBSHELL: New evidence suggests Charlottesville was a complete SET-UP” on August 19, 2017;

WHEREAS, Wilburn admits that Gilmore was not involved in a set-up or in any other way with the August 2017 Unite the Right rally in Charlottesville and the terrorist attack that killed Heather Heyer;

WHEREAS, Wilburn does not contest Gilmore’s allegation of defamation;

WHEREAS, the parties desire to amicably resolve all claims arising out of this action;

WHEREAS, in lieu of damages, Wilburn agrees to make a donation of \$2,000 to the Legal Aid Justice Center;

WHEREAS, Gilmore and Wilburn, having entered into a settlement agreement, hereby stipulate to the entry of an order in this action, as follows:

IT IS ORDERED, ADJUDGED, AND DECREED as follows:

1. This Court has jurisdiction over the subject matter of the above action and has personal jurisdiction over the parties for purposes of this action and as set forth in Paragraph 3 below.
2. Wilburn admits that he is liable for the claims asserted by Gilmore in this action.
3. As a condition of settlement, Wilburn has agreed to make a charitable donation of \$2,000 to the Legal Aid Justice Center.
4. The parties agree that this Court will retain jurisdiction to enforce the terms of the parties' settlement agreement and to enforce and resolve any disputes related thereto, if necessary.
5. This action and all defenses thereto are hereby dismissed with prejudice and without costs, disbursements, or attorneys' fees to any party.

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Attorneys for Plaintiff

SO ORDERED this _____ day of _____, 2021.

NORMAN K. MOON
SENIOR UNITED STATES DISTRICT JUDGE